

**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Michigan**

United States of America

v.

James B. Jackson, III,

Case: 4:23-mj-30497

Judge: Ivy, Curtis

Filed: 12-20-2023

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 18, 2023 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:

**Please see affidavit**

Continued on the attached sheet.



Complainant's signature

Candace Booth, Special Agent, ATF

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence and/or by  
reliable electronic means.

Date: December 20, 2023

City and state: Flint, MI

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**  
*United States v. James B. Jackson III*

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I, Candace Booth, being duly sworn, hereby depose and state as follows:

*Introduction and Agent Background*

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), currently assigned to the Flint, Michigan, Field Office. I have been an ATF Special Agent since 2009. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a US Border Patrol Agent. I have participated in numerous state and federal investigations including narcotics trafficking illegal firearms possession, firearms trafficking, shooting investigations, as well as other types of criminal investigations. Because of my involvement in these and other investigations, I have sworn to several federal search and arrest warrants.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show only that there is sufficient probable cause and does not set forth all of my knowledge about this matter.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that James Bertram Jackson III has violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm.

*Probable Cause*

4. On December 18, 2023, at about 1750 hours, Flint City Police Officers assisted in a traffic stop of a possible robbery suspect near Stonegate Apartments. Agents of The Bureau of Alcohol, Tobacco, Firearms, and Explosives, (ATF) were conducting surveillance on an apartment inside Stonegate. The apartment was believed to contain firearms stolen from Dunham's on December 16, 2023. The apartment was under surveillance while waiting for a federal search warrant to be signed. ATF Special Agent (SA) Dustin Hurt, observed an individual, later identified as Jackson, leave the apartment, and get into a white Dodge Charger bearing Texas license plate SWN8245. Flint Officer Pillsbury was advised by the surveillance units that the vehicle was traveling westbound on Atherton Road from Stonegate Apartments towards Dort Hwy. Officer Pillsbury observed the white Dodge Charger travel west on Atherton Road through Dort Hwy and complete a U-turn, then enter the parking lot of the Sunoco gas station at 1330 Atherton Road. Officer Pillsbury activated his emergency lights, and the vehicle came to a complete stop.

5. Officer Pillsbury made contact with the driver, identified as James Bertram Jackson III. Officer Pillsbury was advised by ATF Task Force Officer Bobby

Fowlkes that there was probable cause to search the vehicle. Officer Pillsbury asked Jackson if he would consent to a search of the vehicle and Jackson refused. At this time, Michigan State Police Troopers Baxter and Swales arrived. Officer Pillsbury advised Jackson to exit the vehicle and he continued to refuse. The Troopers told Officer Pillsbury that he was being contacted on the radio, and as Officer Pillsbury returned to his police vehicle to answer his radio, he heard Jackson's engine revving, then saw Jackson accelerate the white Dodge Charger east toward S. Dort Hwy. Officer Pillsbury returned to his police vehicle and pursued the Dodge Charger. Jackson continued south on S. Dort Hwy, then turned west on Hemphill Road with speeds up to 70 mph in a posted 35 mph zone. Jackson disregarded the red traffic signal at S. Saginaw St. and turned north from Hemphill Rd. Jackson was swerving through traffic and between lanes. Jackson turned east on E. Atherton Road and disregarded the red traffic signal at Ogema St. and reached speeds of 60 mph in a residential area. Jackson continued east on E. Atherton Road through S. Dort Hwy, then turned north on Stonegate Drive. Jackson continued on Stonegate Drive then turned south on Kleinpell Street. Jackson continued to flee the police until he reached Loder Street. Jackson then exited his vehicle on foot and attempted to flee. Flint Police Officer Andrew Defauw and Pillsbury pursued on foot. Officer Defauw caught up to Jackson in the parking lot of 2380 S. Center Road and a brief struggle ensued. Jackson was taken into custody and secured in Officer Byron Norris's cruiser.

6. On 12/18/23 at approximately 2012 hours, Flint Officer Mays was dispatched to assist in the pursuit of Jackson. As Officer Mays followed the radio traffic, Officer Mays observed Officer Pillsbury pursuing behind the white Dodge Charger driven by Jackson heading into Stonegate Apartments. Officer Mays was traveling North on Stonegate Drive behind Officer Pillsbury and observed a blinking flashlight in the middle of the road. Officer Mays approached the blinking flashlight and observed a black handgun with a flashlight attachment in front of 3204 Stonegate Drive. Officer Mays stated that the firearm was cold to the touch but was not covered in snow, as there was light snow and icy conditions at the time. Officer Mays stated that she did not observe any other vehicles in the roadway other than the dodge charger and the Flint City police vehicle. The firearm recovered was a black Glock, 10 mm handgun with serial number BYDE610. A Firearm was check confirmed through LEIN and there was no record. The Glock firearm was turned over to ATF.

7. During the pursuit of the white Dodge Charger, ATF Special Agents continued surveillance at 3522 Stonegate Drive. I spoke with ATF Special Agent Hurt, who told me that the surveillance units observed the white charger traveling north on Stonegate Drive with the police vehicles traveling behind the charger. The surveillance units did not observe any other vehicles on the roadway before the police unit stopped and recovered the firearm from 3204 Stonegate Drive.

8. On December 20, 2023, I took photographs of the recovered Glock. The firearm was smooth with no blemishes on one side, and the other side contained scratch and scuff marks ground into the firearm consistent with the firearm hitting the street and possibly being run over. See photos below:



9. James Jackson was convicted in 2006 in the 7<sup>th</sup> Circuit Court for Attempt-Felony receiving and concealing stolen property- motor vehicle and in the United States District Court for the Eastern District of Michigan in 2014 for being a felon in possession of a firearm.

10. James Jackson was sentenced to 94 months' imprisonment for his 2014 conviction for being a convicted felon in possession of a firearm and 24 months' supervised release.

11. On December 20, 2023, I spoke with ATF Special Agent Dustin Hurt, who is a Firearms Interstate Nexus trained Special Agent. From the information provided, and based on Special Agent Hurt's training and experience, the above-described Glock, model 20 Gen4, 10 mm caliber pistol with serial number BYDE610, was manufactured outside of the state of Michigan, and therefore traveled in or affected interstate or foreign commerce. The above-described Glock handgun is also a "firearm" as defined in 18 U.S.C. § 921.

*Conclusion*

12. Based on the above and my training and experience involving firearms investigations, there is probable cause to believe that on December 18, 2023, James Jackson, knowing of his status as a convicted felon, knowingly possessed, in and affecting interstate commerce a firearm, in violation of 18 U.S.C. § 922(g)(1).



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Candace Booth, Affiant  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on December 20, 2023.



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Hon. Curtis Ivy, Jr.  
United States Magistrate Judge